

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WILL CO. LTD. a limited liability company
organized under the laws of Japan,
Plaintiff,

vs.

KA YEUNG LEE, an individual; YOUHARA
MARKETING AND PROMOTION LIMITED, a
foreign company; and DOES 1-20 d/b/a
THISAV.COM

Case No. 3:20-cv-05802- BHS

AGREED REQUEST TO RENOTE
DEFENDANTS' MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION

AGREED REQUEST TO RENOTE MOTION

Subject to approval of this Court, Defendants Ka Yeung Lee and Youhara Marketing and Promotion Limited ("Defendants"), and Plaintiff Will Co. Ltd. hereby agree and request that defendants' Motion To Dismiss For Lack Of Personal Jurisdiction (Docket No. 18) be re-noted from April 2, 2021 to April 16, 2021. The purpose of this extension is based on the following:

1. Plaintiff's Opposition to Defendants' Motion to Dismiss raises factual and legal issues which Defendants would like to review further with their clients, who are located in Hong Kong.

1 2. Plaintiff in this case had apparently requested and received documents from a
2 third party, some of which Plaintiffs utilized in their Opposition to Defendants' Motion.
3 These documents were not previously provided to Defendants.

4 3. Because Defendants had not seen or received the documents that had been
5 produced to Plaintiff prior to the filing of Plaintiff's Opposition, Defendants requested that
6 Plaintiff produce said documents and provide Defendants with a two-week courtesy extension
7 of time in order to permit Defendants time to review the materials and prepare an adequate
8 response to the same.

9 4. Counsel for Plaintiff has graciously agreed to Defendants' request that the
10 motion be re-noted to April 16, 2021.

11 5. This request to re-note the motion is made in accordance with such agreement
12 among Defendants' and Plaintiff's counsel and is not made for purposes of delay or any other
13 improper purpose.

14 Dated this 1st day of April, 2021.

15 Respectfully Submitted:

16 /s/ Philip Mann

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13 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Philip P. Mann, hereby certify that on April 1, 2021, I caused a true and correct copy of the foregoing REQUEST TO RENOTE DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION to be filed in this Court's CM/ECF system which will send notice of such filing to all parties who have appeared in this matter.

DATED: April 1, 2021.

s/ Philip P. Mann
Philip P. Mann, WSBA No. 28860
Mann Law Group pllc